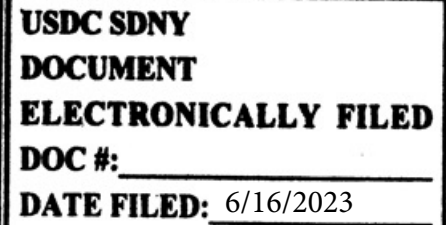




The DeHaan Law Firm

300 Rabro Drive East ■ Suite 101 ■ Hauppauge, New York 11788 ■ 631-424-1100



June 15, 2023

Via ECF

Katharine H. Parker, U.S. Magistrate Judge
U.S. District Court
500 Pearl Street, Room 750
New York, NY 10007

Re: Thompson v. Kijakazi, Acting Comm'r of Soc. Sec.
Docket No.: 1:23-CV-00996-KHP

Dear Magistrate Judge Parker:

I represent the plaintiff, Eric C. Thompson, in the above-referenced matter seeking review of the Commissioner's denial of Social Security benefits. Kristina Daniellle Cohn of the Office of General Counsel represents the Commissioner.

I write in accordance with Your Honor's Individual Practice Rules to request an adjournment of the briefing schedule in this matter, which would result in the following changes:

	<u>Current Deadline</u>	<u>New Deadline</u>
<u>Plaintiff to File Motion</u>	<u>July 24, 2023</u>	<u>September 22, 2023</u>
<u>Defendant to File Opposition/Cross-Motion</u>	<u>September 22, 2023</u>	<u>November 21, 2023</u>
<u>Plaintiff to File Reply</u>	<u>October 13, 2023</u>	<u>December 8, 2023</u>

I apologize for the length of the adjournment requested, which is much longer than I would normally request, but between now and the current deadline for me to serve the plaintiff's motion, I already have three (3) other moving briefs due in other districts, as well as an appellate brief due in the Second Circuit. Further, from June 25th through the end of August, I already have another two (2) moving briefs and one (1) reply brief in other districts, as well as an administrative deadline in an ERISA case, among other conflicts including some personal issues that will take me out of the office for several days. In addition, I note that I have only recently been retained in this matter and was uninvolved in Mr. Thompson's claim at the administrative level. As a result, it simply will not be possible for me to complete the plaintiff's moving brief any earlier than the requested date.

I have consulted with Ms. Cohn, and she consents to this request.

There was one prior *joint* request for an extension of the briefing schedule, which was granted. However, I note that prior Plaintiff's counsel, who had represented Mr. Thompson

THE DEHAAN LAW FIRM P.C.

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Katharine H. Parker, U.S. Magistrate Judge
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administratively on this claim and thus had prior familiarity with this matter, agreed to those dates. I have not made any prior requests for an adjournment of these dates.

Thank you for Your Honor's consideration of this request, and if any additional information is needed, please do not hesitate to contact me.

Respectfully submitted,

THE DEHAAN LAW FIRM P.C.

By: /s/ John W. DeHaan

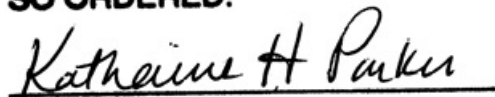
John W. DeHaan, Esq.

jdehaan@dehaan-law.com

cc: Kristina Danielle Cohn, OGC (Via ECF)

APPLICATION GRANTED. Further extensions to the briefing schedule will not likely be granted absent a showing of good cause.

SO ORDERED:



HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE 6/16/2023